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EX PARTE

FILED ELECTRONICALLY VIA ECFS

April 6, 2005

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Room TW-A325
Washington, DC 20554

RE: Presubscribed Interexchange Carrier Charges,
CC Docket No. 02-53, FCC 05-32

Dear Ms. Dortch:

On April 5, 2005, Melissa Newman and Joan O'Donnell (in person) and Wendy Moser and Aaron Smith (by phone), all of Qwest, met with Jennifer McKee, Judy Nitsche, Richard Kwiatkowski, R. L. Smith and James Lichford of the Wireline Competition Bureau to discuss Qwest's concerns with the implementation of the Commission's Report and Order, *In the Matter of Presubscribed Interexchange Carrier Charges*, CC Docket No. 02-53, FCC 05-32 (*rel. Feb. 17, 2005*).

The purpose of the meeting was to request an extension of the effective date indicated in the Order and to provide the Commission with information detailing the work that needs to be done in order to implement the order.

The attached document was used in our discussion.

Sincerely,

/s/ Joan O'Donnell

Attachment

Copy (*via email*):
Jennifer McKee
Judy Nitsche
Richard Kwiatkowski
R. L. Smith
James Lichford

Qwest Communications International, Inc.
Meeting with FCC Wireline Competition Bureau – Pricing Policy Division
April 5, 2005

Presubscribed Interexchange Carrier (PIC) Charges

In the Matter of Presubscribed Interexchange Carrier Charges, CC Docket No. 02-53,
Report and Order, FCC 05-32 (released February 17, 2005) (“Order”).

Qwest requests that the Commission delay the effective date of the Order for six to eight months so that we can make the necessary system modifications, with a six-month implementation being an aggressive target for Qwest.

- Compliance requires structural, process and regulatory changes
 - changes in billing and ordering systems
 - redesign of internal processes
 - testing
 - rate changes; state and federal tariff changes
 - employee training
- Current systems structure. Qwest’s current billing structure must be modified significantly to implement the Order.
 - Qwest CRIS Billing System has three regional platforms -- Western, Central, and Eastern regions -- that trace back to the original bell operating companies of Pacific Northwest Bell, Mountain Bell and Northwestern Bell.
 - Each has different billing architectures requiring different implementation solutions in the three unique systems platforms.
 - Each regional platform has numerous system modules that are interdependent. If one module is modified, other modules have to be assessed, possibly modified, and tested.
 - Systems have been built around a simplified rate structure, without regard whether an order is manual or electronic. The existing architecture never conceived that different PIC charges would apply for manual or electronic interpreted events.
- Systems changes. The following system changes need to be made for implementation:
 - CRIS – The Customer Record Information System (CRIS) is the billing engine and account database for millions of Qwest consumer and business customers.
 - A new field identifier (“FID”) must be created in addition to existing PIC Universal Service Order Codes (“USOCs”). These new FIDs will track a value that will indicate which service order streams are considered manual versus electronic.
 - New FIDs will have to be added in every system module in every regional platform where present PIC USOCs reside, requiring extensive IT assessing and coding.

- In certain cases, we will have to read additional information from upstream system modules and create system rules to drive specific ordering streams to one of the new FID values.
 - RSS – The Regional Subscription System (RSS) is the primary subscription and account database used for electronic business-to-business commerce between the IXCs and Qwest.
 - Qwest will have to modify rates in its Billing and Receivables Tracking (BART) carrier billing system to apply electronic charges for RSS submitted orders. The current rates are loaded in a table and will require modification
 - Qwest will have to uniquely identify orders that are submitted from the Carrier Service Bureau (CSB) to apply manual rates. Thus, new programming logic will have to be created and tested to apply this new business rule.
- Implementation – Timing and Testing. The Qwest change cycle for the level of complexity impacting several systems -- nine (9) ordering systems and five (5) billing systems -- will require approximately 180 calendar days, broken out into the following phases.
 - The first 60 days are used for Requirements Analysis and Architectural Design functions. This includes inter-system interface understandings and definitions, design issues identification and resolution, general design documentation and estimating levels of effort for resource allocation for each application impacted.
 - Upon initiation of the development phase, the first 10 calendar days are dedicated to application detailed design, then approximately 50 days for coding and stand-alone application module testing, and approximately 60 days of testing for integration, traceability, user acceptance, stress/volume, end-to-end, security and Sarbanes-Oxley compliance and, finally, overall release certification.
- Tariffs. While the Commission's Order is clear as to the federal application of the PIC charge on a simultaneous PIC/LPIC change, there is a relationship between the changes to the intrastate (state) portion of a simultaneous PIC change. This relationship will require that Qwest file changes to its intrastate tariffs.
 - The intrastate tariff changes may be as short as a one (1) day filing or as long as a thirty (30) day filing. In the immediate instance and as currently required by the FCC, Qwest must file its revised interstate tariff by April 14, 2005 to become effective upon fifteen (15) days notice, which is April 29, 2005. However, some state filings will require 30 days to become effective. This presumes that no state commission would suspend the 30 day filing and therefore delay the effectiveness of the tariff. Given this, Qwest will not be able to charge for the intrastate portion of a simultaneous PIC change until state approval is obtained.
- Employee Training.
 - Preparation of training materials for customer service representatives.
 - Training of customer service representatives working in all segments of the business.